

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DUNN ENGINEERING
ASSOCIATES, P.C.

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Criminal No.: 05 CR 128

Filed: 04/11/05

Violation: 18 U.S.C. § 201(c)(1)(A)

INFORMATION

The United States of America, acting through its attorneys, charges:

I.

The Defendant

1. Dunn Engineering Associates, P.C. (“Defendant”) is a professional corporation organized and existing under the laws of the State of New York.

II.

Description of the Offense

2. From approximately May 24, 2001 to June 07, 2003 the Defendant performed traffic engineering services for the Traffic Services Administration, a division of the District of Columbia’s Department of Transportation (hereinafter collectively referred to as the “D.C. D.O.T.”) under its \$17.5 million Integrated Traffic Management System (“I.T.M.S.”) contract.

3. At all times relevant to this Information D-1 and D-2, neither of whom is named as a defendant herein, were principals, officers and owners of the Defendant with supervisory authority for the Defendant’s performance of the I.T.M.S. contract.

4. From approximately May 2001 to April 2003 A-1, not named as a defendant herein, was the D.C. D.O.T. Associate Director charged with the administration and oversight of the I.T.M.S. contract.

5. On or about October 18, 2002 the Defendant, through D-2 after consultation with D-1, gave an item of personal value to A-1, to wit, it paid a \$1,348.91 hotel bill for and on behalf of A-1.

6. In giving the item of personal value detailed in Paragraph 5 both D-1 and D-2 were acting within the scope of their respective employment as officers of the Defendant and with an intent to benefit the Defendant.

7. The gift of the item of personal value detailed in Paragraph 5 was not provided for by law for the proper discharge of A-1's official duty.

8. The Defendant, through D-1 and D-2, gave the item of personal value detailed in Paragraph 5 for an official act to be performed by A-1, a public official, to wit, favorable treatment of the Defendant by A-1 in his future administration and oversight of the I.T.M.S. contract.

III.

Jurisdiction and Venue

The offense charged in this Information was carried out in the District of Columbia within the five years preceding the filing of this Information.

ALL IN VIOLATION OF TITLE 18 UNITED STATES CODE, SECTION 201(c)(1)(A).

DATED: 04/11/05

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Assistant Attorney General

/s/
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